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April 28, 16

BY ECF

The Honorable Roanne L. Mann
United States Courthouse
225 Cadman Plaza
Brooklyn, New York 11201

Re: *Quick v. Felipe Cardenas et al.*, 15 Civ. 6700 (NGG)(RLM)

Your Honor:

I represent Plaintiff in this civil rights matter. I write in response to the Court's April 28, 2016 Order to Show Cause why Plaintiff's Amended Complaint should not be stricken.

As the Court observed in its Order, Plaintiff filed the Amended Complaint two weeks after the April 15, 2016. At the outset, I apologize. Prior to filing the document I obtained Defendants' consent but of course this is not sufficient insofar as I must also obtain the Court's leave given the pretrial schedule.

In addition to asking the Court to accept my apology, I also respectfully request that the Court grant me leave to file the Amended Complaint and not strike it from the docket. The amended complaint was filed late solely due to attorney error. I have put in place measures which to assure this will not happen again.

Although this error is unfortunate, allowing the Amended Complaint to remain the operative pleading will not cause prejudice to Defendants or unduly delay the Court's management of pretrial proceedings.

In light of the foregoing, Plaintiff respectfully requests that the Court not strike the Amended Complaint from the docket.

Respectfully,

/ss/

Robert Marinelli